

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>  <b>Ryan Timmons</b>	<b>BANKRUPTCY CASE NO.</b>  <b>Case 23-13778-amc</b>
--	--

**RESERVATION OF RIGHTS OF HARRY TIMMONS AND MARJORIE TIMMONS**

Harry Timmons and Marjorie Timmons (“the Timmons”), creditors and parties-in-interest, by counsel, hereby file this Reservation of Rights to object or otherwise respond to the bankruptcy plan filed by Debtor Ryan Timmons on January 29, 2024.

On January 29, 2024, Debtor filed his proposed Chapter 13 Plan (“Plan”) [Dkt. No. 19]. On March 18, 2024, Chapter 13 Trustee Scott F. Waterman filed a Motion to Dismiss for Failure to Make Plan Payments (“Motion”) [Dkt. No. 23]. The Court scheduled a hearing on the Motion for April 24, 2024. Given the pending Motion, the Trustee did not conduct the scheduled meeting of creditors on March 22, 2024.

The Timmons object to Debtor’s proposed Plan but have not had the opportunity to examine the Debtor given Trustee’s pending Motion. The Timmons reserve the right to pursue their objections at a later date in accordance with further order or instruction by the Court.

Respectfully submitted,

Date: April 17, 2024

/s/ *Sarah D. Boutros*

Sarah D. Boutros, Esquire, ID. No. 328888  
Two Liberty Place  
50 South 16th Street, 22nd Floor  
Philadelphia, PA 19102  
sboutros@eckertseamans.com  
(215) 851-8519 (Telephone)  
(215) 851-8383 (Telecopy)

*Attorney for Harry Timmons & Marjorie Timmons*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>  <b>Ryan Timmons</b>	<b>BANKRUPTCY CASE NO.</b>  <b>Case 23-13778-amc</b>
--	--

**CERTIFICATE OF SERVICE**

I, Sarah D. Boutros, Esquire, do hereby certify that on April 17, 2024, I caused a true and correct copy of the foregoing Reservation of Rights be served upon all attorneys of record via the Court's ECF system.

Respectfully submitted,

/s/ *Sarah D. Boutros*

Sarah D. Boutros, Esquire, ID. No. 328888